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Christal Dennis

Digitally signed
by Christal Dennis
Date: 2018.03.08
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FRANCIS A. CAIN
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March 5, 2018

Federal Election Commission
Office of Complaints Examination &
Legal Administration
Attn: Christal Dennis, Paralegal
999 E. Street, NW
Washington, DC 20463

Via Email: CELA@fec.gov

Re: MUR 7326
Response of "Commercial Realty Group, LLC"

Dear Ms. Dennis:

On February 27, 2018, Robert Shagan, as Chief Manager of Commercial Realty Investment Group, L.L.C. (hereinafter, "CRIG" – incorrectly identified in the Complaint as "Commercial Realty Group, LLC") transmitted a statement of Designation of Counsel to the General Counsel's Office via email to CELA@fec.gov, designating the undersigned as counsel for CRIG before the Commission with respect to this matter. I am enclosing herewith a copy of this designation notice for your reference.

CRIG is a Tennessee member managed, member obligated, limited liability company consisting of two members, Barbara Jean Shagan and Robert Shagan, Barbara Jean Shagan being a 99% owner and Robert Shagan being a 1% owner. Robert Shagan acts as the Chief Manager for CRIG. CRIG has at pertinent times been a limited liability company electing partnership treatment for purposes of federal taxation. Both Barbara Jean Shagan and Robert Shagan are natural persons. There are no corporate or non-natural members of CRIG whatsoever. Both Barbara Jean Shagan and Robert Shagan are natural born citizens of the United States of America and have never had any other citizenship. There never has been any party having any interest in CRIG who is not a natural born citizen of the United States of America or otherwise held any foreign citizenship. With respect to the 2018 campaign for Tennessee's Second Congressional District, neither Barbara Jean Shagan nor Robert Shagan has made any direct contributions to Burchett for Congress. Moreover, the public record, (as reflected in the attached Designation of Counsel form) and the signature of Robert Shagan on said form bear out each of these foregoing facts.

March 5, 2018

Page 2

According to the Complaint, which CRIG accepts, for purposes of this response, as factually accurate, without waiving its right to contest any facts which may be set forth in the Complaint, on or about November 2, 2017, CRIG donated \$300.00 to Burchett for Congress, the congressional campaign committee for Tim Burchett, a candidate seeking election to Tennessee's Second Congressional District House of Representatives seat.

As shown in the public record, CRIG has been an active Tennessee LLC in good standing since 1994. The principal business purpose of CRIG is the management of residential and commercial real estate in the East Tennessee area. CRIG has never acted as a conduit for any money not earned by CRIG to provide anything of value to any federal election candidate.

It is possible that CRIG failed to include information regarding its status as a partnership-taxed limited liability company, and the respective interests of Barbara Jean Shagan and Robert Shagan with respect to CRIG. If such is the case, it would have been as a result of inadvertence, rather than any attempt or intent to violate any applicable law. To this end, I am copying Roger Goins, Treasurer of Burchett for Congress, with this correspondence informing him that CRIG is indeed a partnership-taxed limited liability company, and that political contributions from CRIG should be allocated 99% to Barbara Jean Shagan and 1% to Robert Shagan (*i.e.*, \$297.00 and \$3.00, respectively). I am copying this letter to the mailing address of record with the Commission, P.O. Box 51345, Knoxville, TN 37950.

To the extent that there has been any inadvertent failure to comply with any applicable law with respect to CRIG and Burchett for Congress, I sincerely hope that this correspondence may serve to resolve any such matter. To this end, I would appreciate the Commission dismissing the Complaint insofar as it involves CRIG. Please feel free to contact me with any questions you may have. Thank you for your consideration.

Sincerely,



Matthew A. Grossman
FRANTZ, McCONNELL & SEYMOUR, LLP

MAG:bhr

cc: Mr. Robert Shagan (Via Email)
Roger Goins, Treasurer (Via Email)
Burchett for Congress (Via U.S. Mail)

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Filing Information

Name: **COMMERCIAL REALTY INVESTMENT GROUP, L.L.C.**

06/30/2009	2008 Annual Report	6561-2100
06/03/2009	Notice of Determination	ROLL 6550
03/14/2008	2007 Annual Report	6246-0381
03/19/2007	2006 Annual Report	5991-0731
03/21/2006	2005 Annual Report	5725-1867
03/23/2005	2004 Annual Report	5400-2563
03/15/2004	2003 Annual Report	5065-3364
04/21/2003	2002 Annual Report	4795-2720
03/26/2002	2001 Annual Report	4459-0050
05/01/2001	2000 Annual Report	4191-0058
03/28/2000	1999 Annual Report	3863-0698
06/03/1999	Articles of Amendment	3689-2344
04/22/1996	Administrative Amendment	3161-1515
	Fiscal Year Close Changed	
12/29/1995	CMS Annual Report Update	3094-1902
	Principal Address Changed	
	Registered Agent Physical Address Changed	
09/16/1994	Initial Filing	2891-0839

Active Assumed Names (if any)

Date

Expires